



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL

March 30, 2012

RETURN RECEIPT REQUESTED

Mr. Bud E. Smith
Director, Environmental Control
Severstal International
1134 Market Street
Wheeling, West Virginia 26003-2971

Re: Severstal International, Follansbee, WV Facility, WVD004319539
Administrative Order # RCRA-III-080-CA, RFI Report response to comments

Dear Mr. Smith:

EPA has completed its review of the January 12, 2012 Responses to EPA's December 6, 2011 comment letter and the Phase II Work Plan dated September 4, 2009. EPA grants approval of the workplan with the following comments based on our conference call of March 16, 2012.

Comment 15 - WPSC must provide details of the in vitro experiment cited in the Proctor, et al. paper. EPA's preference is that the paper in its entirety be available for review. This in vitro study, authored by the ChemRisk group, is not available to EPA through any of its databases or online sources, and must be reviewed in order for EPA to accept/approve the quantitative analysis submitted in the site-specific risk evaluation of on-site soils/slag.

Soil/slag data will be evaluated in the risk assessment in two ways 1) a baseline evaluation, where no bioaccessibility factors are applied; and 2) a site-specific evaluation using bioaccessibility factors developed for the site. A complete discussion of these two evaluations will be included in the uncertainty section of the risk assessment.

Comment 37 - EPA will review results of the additional work proposed for the hillside area before making a final determination of risks associated with PAHs in surface soils.



Should you have any questions concerning EPA comments, please feel free to contact me at 215-814-3433. EPA looks forward to working with Severstal to complete the RFI investigation.

Sincerely,

A handwritten signature in cursive script that reads "Estena A McGhee".

Estena A. McGhee, Project Manager
Office of Remediation

cc: Joel Hennessy, 3LC10
Betty Ann Quinn, 3LC10
Ruth Prince, 3LC10

